

Atlantic Richfield Company

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March 5, 2010

CERTIFIED – RETURN RECEIPT REQUESTED

Ms. Nadia Hollan Burke
Remedial Project Manager
U.S. Environmental Protection Agency Region 9
75 Hawthorne Street, SFD-8-2
San Francisco, CA 94105

**Subject: February 2010 Monthly Report, Yerington Mine Site, Lyon County, Nevada:
Administrative Order for Remedial Investigation and Feasibility Study, EPA Docket
No. 9-2007-0005; Administrative Order on Consent, EPA Docket No. 09-2009-0010**

Dear Ms. Hollan Burke:

Pursuant to the above referenced orders issued by the U.S. Environmental Protection Agency - Region 9 (EPA), Atlantic Richfield Company (ARC) has prepared the following monthly report for RI/FS and removal action activities at the Yerington Mine Site (Site) during February 2010.

February 2010 Activities

- Continued routine Site O&M, security and bird deterrent activities including operation of the propane cannons for the Arimetco ponds (with the exception of the VLT Pond, as directed by EPA). The bird guard towers are active due to meteoric water remaining in the ponds.
- PWS evaporation pond levels: North Cell 0.25 feet; Middle Cell = 0.29 feet; South Cell 0.42 feet.
- Arimetco heap leach fluid management system (FMS): 1) total estimated gallons transferred from VLTSP Pond to the FMS Evaporation Pond = approximately 0 gallons; slot sediment pond (SSP) to the FMS Evaporation Pond = approximately 36,000 gallons. Phase 1 Pond to Evaporation Pond = 0 gallons; 2) Pond levels: Phase 1 Pond = 3.5 feet; Evaporation Pond = 6.75 feet; VLT Pond = 14.00 feet; Slot 2 Pond = 16.25 feet.
- The Site received approximately 0.90 inches of precipitation during the month of February 2010. Melted snow and precipitation continues to keep the site muddy during much of the month. Total precipitation thus far for the year 2010 was approximately 1.49 inches.

Other Site Activities

- Comstock Inspections located utilities for Electrical Hazards Removal Action - Phase 2 work February 2.
- Tom Dunkelman (EPA), Joe Sawyer (NDEP), John Batchelder (Envirosolve), Penny Bassett and Gary Barrett (BC) reviewed Electrical Hazards Removal Action - Phase 1 work February 3.
- Tri State Survey located piezometer locations February 4.
- Owen Brothers conducted pumpback well rehabilitation activities, including video surveys, February 8-25.

A BP affiliated company



February 2010 Activities - Continued

Other Site Activities - Continued

- Rhys McDonald and Royanne Barringer (BC) performed maintenance and calibration of the meteorological station February 11.
- Fawcett Electric and Desert Engineering performed Electric Hazards Removal Action - Phase 2 work, periodically depending on weather conditions, February 17-26.
- Yellow Jacket Drilling initiated piezometer installation activities at the PWS February 23-28.

Site Characterization

- Site-wide monthly groundwater elevation measurements were obtained February 22-24.
- A pit lake water elevation of 4220.63 feet amsl was recorded on February 23, 2010 from the pressure transducer, an increase of 0.59 feet since January 27, 2010. The pit lake elevation has risen 3.17 feet since February 23, 2009.
- Continued meteorological monitoring at the AM-6 location including wind speed/direction, temperature, relative humidity, barometric pressure, precipitation and solar radiation. Conducted met station maintenance and calibration.
- Continued work on the Human Health Risk Assessment for the Inhalation Pathway - Revision 3.
- Continued to compile the 2009 Annual Groundwater Monitoring Report.
- Responded to EPA January 29 comments on the Draft Domestic Well Monitoring Plan (QAPP Addendum) dated December 11, 2009 on February 5. Submitted responses to additional EPA comments dated February 4, and transmitted the Domestic Well Monitoring Plan (QAPP Addendum) - Revision 1 dated February 12.
- Continued the preparation and mailing of access agreements for the domestic well sampling program, to be implemented March 15, 2010.
- Reviewed planned monitor well locations in the field. Prepared and mailed access agreements for the 2010 monitor well borehole characterization and monitor well installation program.
- Initiated work on the community outreach plan for the 2010 monitor well borehole characterization and monitor well installation program.
- Submitted the PWS Characterization Work Plan Addendum - Revision 2 dated February 17.
- Conducted pumpback well rehabilitation activities and video surveys.
- Surveyed piezometer locations, and initiated ground clearance and piezometer installation activities in support of the PWS Characterization Work Plan Addendum aquifer testing program.
- Responded to February 1 EPA comments on the 2007 Draft Process Areas RI Work Plan on February 18. Attended a teleconference call on February 25 to discuss upcoming characterization activities associated with the Process Areas.
- Documented portions of the Process Areas that contained standing meteoric water, and areas that indicated recent accumulations of incident precipitation and runoff, resulting from a February 6 precipitation event. Presented results to EPA in a technical memorandum dated February 16.
- Conducted opportunistic field sampling of standing meteoric water at three locations on the VLT pile, which accumulated as a result of incident precipitation and runoff on February 6. Presented a description of sampling activities to EPA in a technical memorandum dated February 12. A second technical memorandum will include analytical results when they become available.
- Continued Site wildlife surveys, maintenance of wildlife observation database and preparation of weekly wildlife observation report. Submitted a letter dated February 23 that ARC has retained Arcadis to replace Integral as the lead on wildlife monitoring and mitigation activities at the Site.

AOC Removal Actions

- Initiated Phase 2 of the Electrical Hazards Removal Action.
- Based on communications between EPA and ARC in January 2010, ARC requested an extension for the submittal of ARC responses to EPA comments dated February 1, 2010 on the Anaconda Evaporation Ponds Removal Action Characterization Data Summary Report - Revision 1, dated October 15, 2009.

Site Issues

- Non-Routine pumping continues from the Slot Pond leak detection sump at a rate of approximately 1.5 gallons per minute. A surface expression of the leak adjacent to the Slot Pond continued in the form of frozen moisture.
- Repairs were made to the fence near the electric laydown yard after a break-in had occurred on the weekend of February 6-7.
- Muddy conditions resulting from melting snow and rain during the month of January necessitated extra precautions be taken for all site activities.

Planned March/April 2010 Activities

Site Characterization

- Continue Site wildlife surveys, maintenance of wildlife observation data and preparation of wildlife observation reports.
- Continue groundwater elevation and pit lake level monitoring. Continue meteorological monitoring at AM-6.
- Submit the 2009 Annual Groundwater Monitoring Report in March.
- Implement, the 1Q 2010 monitor well and domestic well sampling events.
- Continue piezometer installations associated with the PWS Characterization Work Plan Addendum aquifer testing program. Install pressure transducers in piezometers and initiate aquifer testing in April.
- Continue access agreement communications for the 2010 monitor well program.
- Conduct pre-drilling activities (e.g., site access prep and ground clearance) in March, and initiate borehole drilling, zonal sampling and monitor well installation program in April pursuant to the Draft 2010 Monitor Well Installation Work Plan, as amended and approved by EPA.
- As needed, discuss technical elements of the 2010 Monitor Well Installation Work Plan.
- Attend technical meetings on March 4 to discuss Peri irrigation fields and evaporation ponds removal action.
- Continue to discuss the Draft Process Areas Vadose Zone and Groundwater Characterization Work Plan submitted in December 2009.

AOC Removal Actions

- Continue routine O&M, site security, and bird deterrent activities. As requested, support USFWS' contractor inspection activities during work week business hours.
- Continue to evaluate flow meters installed in the Arimetco FMS. Continue water balance calculations for the Arimetco FMS.
- Discuss the Draft Transite Pipe Removal Action Plan (RAP) with EPA.
- Continue Phase 2 (trenching and burial of surface electrical lines) of the Electrical Hazards Removal Action in early March and Phase 3 (installation of new power service to replace the Site substation) in late March/early April.
- Continue discussions with EPA on the Process Areas Radiological Characterization Work Plan - Revision 1, and initiate a revised Work Plan.
- Upon receipt of revised EPA comments, provide responses to comments to the Draft Site O&M Plan and a revised O&M Plan.

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If you have any questions or comments, please feel free to contact me at (714) 228-6774 or via e-mail at jack.oman@bp.com.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Oman', with a stylized flourish at the end.

Jack Oman
Project Manager

cc: Dave Seter, EPA – via electronic mail
Jacquelyn Hayes, EPA – via electronic mail
Svetlana Zenkin, EPA – via electronic mail
Claire Trombadore, EPA – via electronic mail
Jere Johnson, EPA – via electronic mail
Andrew Helmlinger, EPA – via electronic mail
Tom Dunkelman, EPA – via electronic mail
Joe Sawyer, NDEP – via electronic mail
Tom Olsen, BLM – via electronic mail
Dan Newell, City of Yerington – via electronic mail
Phyllis Hunewill, Lyon County Commissioner – via electronic mail
Dennis Stark, Lyon County Manager – via electronic mail
Richard Faber, Lyon County Facilities Engineering – via electronic mail
Tom Grady, Nevada State Assembly – via electronic mail
Justin Whitesides, YPT – via electronic mail
Chairman Emm, YPT – via electronic mail
Dietrick McGinnis, McGinnis and Associates – via electronic mail
Chairman Sammaripa, WRPT – via electronic mail
Roxanne Ellingson, WRPT – via electronic mail
Ron Halsey, Atlantic Richfield Company - via electronic mail
James Lucari, Atlantic Richfield Company – via electronic mail
Roy Thun, Atlantic Richfield Company – via electronic mail
Robin Bullock, Atlantic Richfield Company – via electronic mail
Don Pratt, Atlantic Richfield Company – via electronic mail
John Batchelder, EnviroSolve – via electronic mail
Jim Chatham, Atlantic Richfield Company – via electronic mail
Rich Curley, Curley and Associates, LLC – via electronic mail
David Peri, Peri and Sons – via electronic mail
Ken Greene, CH2M Hill – via electronic mail
Victor Early, Tetra Tech – via electronic mail
Peggy Pauley, YCAG – via electronic mail
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